Res Ipsa Loquitur.—Plaintiff was injured by an electric shock received from one of the poles of defendant's trolley system. The New York Supreme Court in Moglia *v.* Nassau Elec. R. Co., 111 New York Supplement, 70, held that a prima facie case was made, and the trial court committed no error in failing to submit the issue of negligence to the jury, where the defendant offered no evidence, and the lower court instructed the jury that the fact of the accident called for an explanation, and as none was offered the verdict should be for plaintiff. Defendant contended that the jury was not bound to believe plaintiff, but should be free to determine whether he was injured in the manner shown, and, if the doctrine of res ipsa loquitur was applicable, the inference of negligence was for the jury.

This case is clearly distinguishable from Peters *v.* Lynchburg, etc., Light Co., 14 Va. Law Reg. 409, because here the evidence showed that the defective appliance was under the control and management of the defendant and not the plaintiff as in the Peters case.

Death as Ground of Abatement of Contempt Proceeding.—In Wasserman *v.* United States, 161 Federal Reporter, 722, the United States Circuit Court of Appeals decided that the fine of one found guilty of contempt who sued out a writ of error to reverse the judgment, but died before the submission of the case to the higher court, should be considered as a charge against the estate, and that the action did not abate by death.

Who Is an "Indorser."—By the express provisions of Revisal 1905, §§ 2212, 2213, 2219, 2239, one indorsing a note in blank before delivery, without indicating his intention to be bound otherwise, is an "indorser," who, not being given notice of nonpayment and dishonor, is discharged. Perry *v.* Taylor, 62 S. E. 423.

John Armstrong Chanler's (Chaloner's) Case.—Plaintiff had been adjudged insane by the Supreme Court in New York, ordered committed to an asylum, and later the court appointed a committee of his person and property. Subsequently he escaped, and took up his residence in Virginia, where he was adjudged sane. He instituted an action setting up the decree of the Virginia court and demanding damages from his committee in New York for conversion of his property. Defendant alleged in the main action that petitioner was insane and that the Virginia judgment was void. Petitioner's presence was necessary at the main trial in New York, and, as he was in danger of being incarcerated there, he asked for an order protecting him while in attendance at trial. In Chanler *v.* Sherman, 162 Federal Reporter 19, the United States Circuit Court of Appeals, referring to the peculiar predicament in which petitioner is placed, and that